APDES Inspection Report

Permit # AKR06AC70

Stabler Point Rock Quarry

Juneau, AK

August 17, 2016

Prepared by:

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Environmental Protection Agency (EPA), Region 10
Office of Compliance and Enforcement (OCE)
Multimedia Inspection & RCRA Enforcement Unit (MIREU)

Contents

I.	Facility Information	. 1
II.	Inspection Information	. 1
III.	Permit Information	. 2
IV.	Background	. 2
V.	Inspection Chronology	
VI.	Opening Conference	
VII.	Site Review	
VIII.	File Review	. 3
IX.	Areas of Concern	. 3
A.	Representative Sampling	. 4
B.	Track-Out from Vehicles	
X.	Closing Conference	. 4

ATTACHMENT A – Site Map ATTACHMENT B – Photograph Log ATTACHMENT C – CD of Electronic Files

ATTACHMENT D – Post-Inspection Email Correspondence

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Alec Venechuk or from observations during the inspection.)

I. Facility Information

Facility Name: Stabler Point Rock Quarry

Facility Owner/Operator: City and Borough of Juneau (CBJ)

Physical Address: Mile 13 Veteran's Memorial Highway

Juneau, Alaska 99801

Lat/Long: 58.383264°, -134.671545°

Mailing Address: 155 South Seward St, Juneau, AK 99801

NAICS Codes: 212312 - Crushed and Broken Limestone

212313 - Crushed and Broken Granite 212319 - Other Crushed and Broken Stone

Facility Contacts: Alec Venechuk, P.E., Quarry Manager

Engineering and Public Works Department

City/Borough of Juneau

155 South Seward St, Juneau, AK 99801

Phone: 907-586-0874 Fax: 907-463-2606

Email: Alec. Venechuk@juneau.org

Permit Number: AKR06AC70

Receiving Water: Auke Nu Creek

II. Inspection Information

Inspection Date: August 17, 2016

Inspectors: Matt Vojik, Inspector

EPA Region 10, OCE / MIREU

Phone: 206-553-0716

Arrival Time: 10:40 AM

Departure Time: 12:15 PM

Weather: Overcast

Purpose: To determine whether the facility is in compliance with

their Alaska Pollutant Discharge Elimination System

(APDES) permit and the Clean Water Act.

III. Permit Information

This facility is permitted under the APDES Multi-Sector General Permit (MSGP) number AKR06AC70 for stormwater discharges associated with industrial activity. The facility operates under MSGP Sector J (Non-Metallic Mineral Mining and Dressing). The permit became effective on April 1, 2015. The expiration date of the permit is March 31, 2020. Prior to the effective date of the current permit, the facility had coverage under the National Pollutant Discharge Elimination System (NPDES) MSGP number AKR05CF81.

IV. Background

The quarry has been in place for approximately 15 years. The facility is owned and managed by the City and Borough of Juneau (CBJ). Contractors excavate and remove gravel from the quarry under individual mining plans issued by the CBJ. Up to three contractors can conduct mining activities simultaneously at the quarry. Operations include blasting, sorting, crushing, screening and stockpiling. Products range from 3/8-inch gravel to rip rap.

V. Inspection Chronology

This was an unannounced inspection. At 9:00am, I called and left a voicemail message for Mr. Alan Steffert, the former manager of the quarry. I arrived at the facility at 10:00am and received a phone call from Mr. Steffert, who put me in contact with Mr. Alec Venechuk, Quarry Manager, who had just finished a meeting at city hall. I waited at the quarry entrance until Mr. Venechuk arrived at 10:40am. I presented my credentials to Mr. Venechuk and provided him with an EPA Small Business Resources Information Sheet. I was accompanied throughout the inspection by facility representatives. I was not denied access to the facility.

I began the inspection with a brief opening conference with Mr. Venechuk at the scale shack at the entrance to the quarry. After taking a tour of the quarry, I conducted a records review on the tailgate of Mr. Venechuk's truck. We ended with a closing conference to discuss observations and next steps.

VI. Opening Conference

Mr. Venechuk has managed the quarry since May 2016 and is the CBJ's only quarry employee. He visits the site approximately three to five times per week and oversees the individual mining plans of each contractor. Mr. Venechuk is also responsible for MSGP compliance at the facility.

VII. Site Review

Mr. Venechuk took me on a tour of the quarry. A site map appears in **Attachment A** and a photograph log appears in **Attachment B**.

I inspected the upper property boundary (**Photo 1**) and the and lower portion of the quarry (**Photo 2**) near the entrance and scale shack. Stormwater pools in the lower area and drains via gravity to a series of settling ponds (**Photo 3**). Flow from the settling ponds drains along the west side of the paved access road to another settling pond (**Photo 4**) on the north side of Glacier Highway. I followed the flow path to a sump (**Photo 5**), which discharges to Auke Nu Creek before the creek flows under Glacier Highway to Auke Bay. Mr. Venechuk said that most stormwater from the quarry infiltrates into the ground. He said that he has not observed a discharge to Auke Nu Creek in the few months that he has managed the quarry.

On Glacier Highway I observed track-out from the quarry access road (**Photo 6**). Mr. Venechuk said that the quarry's street sweeper (**Photo 7**) is no longer in use, but the CBJ periodically sweeps the shoulder of the highway.

VIII. File Review

After the facility tour, I reviewed the following records:

- Discharge Authorization Letter and Notice of Intent
- Stormwater Pollution Prevention Plan (SWPPP) dated July 29, 2015 (Attachment C)
- Discharge Monitoring Reports (DMRs)
- Sampling and Analytical Records
- Routine Facility Inspection Forms
- Visual Assessment Forms
- Annual Reports
- Corrective Action Logs
- Training Logs

During the file review, I noted that the facility does not monitor for pH in accordance with the effluent limit described in Section 11.J.9 of the MSGP for mine dewatering discharges. Mr. Venechuk explained in a post-inspection email (**Attachment D**) that the facility does not characterize its runoff, which consists of a combination of stormwater and seepage from mine walls, as "mine dewatering." This interpretation is also reflected in Section 3.8.3 of the SWPPP, which states that dewatering is "not applicable at Stabler." I did not find a clear definition of "mine dewatering" in the MSGP.

IX. Areas of Concern

I noted the following areas of concern:

A. Representative Sampling

Section 3.1 of Appendix A of the MSGP states that "samples and measurements must be representative of the volume and nature of the monitored activity or discharge."

Mr. Venechuk said that he has not observed a discharge from the final stormwater collection sump (**Photo 5**), in the few months that he has been the quarry manager. He said that if discharge does not occur during a monitoring period, he will collect a sample of the accumulated flow inside the sump. Consequently, Mr. Venechuk said that the facility has reported exceedances of the benchmark for total suspended solids (TSS) during periods of no discharge at the facility. For example, I noted that monitoring records from July 2016 indicated 150 mg/L of TSS, which exceeds the TSS benchmark of 100 mg/L in Section 11.J.8 of the MSGP. However, Mr. Venechuk said this result was not representative of an actual discharge to Auke Creek.

I advised Mr. Venechuk to ensure that DMR values are representative of actual discharges to receiving water and if no discharge occurs during a monitoring period, the facility should report "no discharge" on the DMR.

B. Track-Out from Vehicles

Section 11.J.4.2.5 of the MSGP states that "a permittee must provide an effective way of minimizing off-site vehicle tracking of sediment from wheels to prevent track-out onto paved surfaces."

During the inspection, I observed track-out from the quarry access road onto Glacier Highway (**Photo 6**). I asked what practices are in place to prevent track-out and Mr. Venechuk said that the facility plans to install a cattle guard at the quarry entrance. He also said that quarry's street sweeper (**Photo 7**) is no longer in use, but the CBJ periodically sweeps the shoulder of the highway.

X. Closing Conference

I held a closing conference with Mr. Venechuk. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. I thanked him for his time and assistance.

Report Completion Date:		
Lead Inspector Signature:		

ATTACHMENT A - Site Map

ATTACHMENT B - Photograph Log

(Photographs were taken by Matt Vojik on August 17, 2016 with a Panasonic DMC-FH25 camera)



Photo 1 / P1020490 – Southeasterly view of the upper portion of the quarry



Photo 2 / P1020482 – Southeasterly view of the lower portion of the quarry



Photo 3 / P1020477 – Southeasterly view of settling ponds on the south side of the scale shack



Photo 4 / P1020486 – Settling pond on the north side of Glacier Highway



Photo 5 / P1020487 – Easterly view of the final stormwater collection sump, which discharges to Auke Nu Creek



Photo 6 / P1020489 – View of track-out from the access road to Glacier Highway



Photo 7 / P1020494 – Street sweeper, no longer in use

Complete list of photographs taken during the inspection:

- P1020477 Southeasterly view of settling ponds on the south side of the scale shack
- P1020478 SWPPP cabinet in the scale shack
- P1020479 Scale shack at the entrance to the facility
- P1020480 Northerly view of the quarry
- P1020481 Westerly view of the quarry
- P1020482 Southeasterly view of the lower portion of the quarry
- P1020483 Northerly view of the northern portion of the facility
- P1020484 Detail view of flow entering the settling pond south of the scale shack
- P1020485 Flow in the drainage ditch along the west side of the quarry access road
- P1020486 Settling pond on the north side of Glacier Highway
- P1020487 Easterly view of the final stormwater collection sump, which discharges to Auke Nu Creek
- P1020488 View of Auke Nu Creek
- P1020489 View of track-out from the access road to Glacier Highway
- P1020490 Southeasterly view of the upper portion of the quarry
- P1020491 Inspection and monitoring log
- P1020492 Training log
- P1020493 CESCL certifications
- P1020494 Street sweeper, no longer in use

ATTACHMENT C - CD of Electronic Files

- Archival Original PhotographsStormwater Pollution Prevention Plan dated July 29, 2015

ATTACHMENT D - Post-Inspection Email Correspondence